

The Honorable Lauren King

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF BRANDON  
CHUN

1 I, Brandon Chun, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I am the Interim Executive Director of Ingersoll Gender Center. In this role, I  
5 oversee our programs, provide administrative and fundraising support, and conduct other  
6 managerial tasks. I have served in this role since November of 2022. Prior to that, I had been a  
7 board member of Ingersoll since 2014. I am an attorney with a background in labor and  
8 employment law.

9 3. Ingersoll Gender Center is an organization by, and for transgender and gender  
10 nonconforming people that provides mutual support through peer led support groups, advocacy  
11 in navigating resources, community organizing, and education—all in the pursuit of our  
12 collective self-determination. We envision a world that nurtures healthy communities free from  
13 violence, centers self-determination for all people, and celebrates all gender identities and  
14 expressions.

15 4. Marsha C. Botzer founded Ingersoll Gender Center in 1977 to provide direct  
16 services and community support to the transgender and gender nonconforming community in  
17 Seattle and Washington State. We have coordinated weekly peer support groups for over 40  
18 years. We serve approximately 30 to 80 individuals in our support groups each week. These  
19 individuals are generally adults in Washington, though we do not restrict our services by age or  
20 location.

21 5. We also maintain a listserv and database of healthcare providers who self-identify  
22 as offering gender affirming care. The database is a resource for the trans community to find  
23 medical providers, therapists, counselors, and other professionals who provide electrolysis, body  
24 work, massage, voice work, and more. The database is accessible to anyone who seeks these  
25 services, including families of trans youth or trans youth themselves. The listserv connects  
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1 gender affirming care providers with each other where they can also share information and  
2 coordinate resources.

3 6. I understand that the President of the United States issued an Executive Order on  
4 January 28, 2025, titled, “Protecting Children from Chemical and Surgical Mutilation” seeking  
5 to end gender affirming care for those under 19 years of age. This Order impacts our organization  
6 and the communities we serve in several ways.

7 7. Relating to our peer support groups, this Order is one of many that restricts or  
8 seeks to eliminate the trans identity out of existence. Even though our peer support groups  
9 generally consist of adults, every trans adult was once a trans kid. This Order is bringing up past  
10 trauma for the adults in our peer support groups. Our support group participants are stressed and  
11 anxious, as well as concerned about their safety, because of this Order and the current  
12 administration’s actions. Some have yet to receive the full scope of gender affirming care they  
13 desire—including medical surgeries—and are concerned that this Order might limit their ability  
14 to access that vital care as providers stop providing the services.

15 8. The gender affirming healthcare providers we communicate with are also  
16 concerned. They are experiencing fear, stress, and anxiety. But for the time being, they express  
17 that they are committed to continuing to provide gender affirming care because of how essential  
18 it is to the trans community. Some of these providers also identify as trans or gender  
19 nonconforming themselves.

20 9. We’ve seen a surge in attendance at our peer support groups since this Order was  
21 signed. We have every intention of continuing to provide our services for trans and gender  
22 nonconforming people, including our database and listserv. We consider these services to be  
23 crucial to the trans and overall LGBTQ+ community. If providers ask to be removed from these  
24 resources, we will comply with that request. We are also considering precautions to protect our  
25 staff and board members from harassment or retaliation, including removing identifying  
26 information from our website.

1 I declare under penalty of perjury under the laws of the State of Washington and the  
2 United States of America that the foregoing is true and correct.

3 DATED this 17 day of February 2025.



4  
5 BRANDON CHUN  
6 Interim Executive Director  
7 Ingersoll Gender Center  
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